

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE  Plaintiff,  v.  TRANS UNION LLC CITY OF PHILADELPHIA Defendant.	C.A. NO: 02-CV-4440
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**PROPOSED VOIR DIRE QUESTIONS  
OF DEFENDANT TRANS UNION LLC**

Trans Union, LLC, respectfully submits the following Proposed Voir Dire Questions and requests that potential jurors responding affirmatively to any of the questions respecting personal credit matters be afforded an opportunity to answer such questions outside of the hearing of the other potential jurors.

1. Have you or a family member obtained a credit report from any source?
  - (a) Did you determine that inaccurate information was contained in the report?
  - (b) If so, was the inaccurate information corrected?
  - (c) Did you (or that person) experience any difficulty or delay in obtaining the correction?
  - (d) What was the name of the company which generated the report?
2. Have you or a family member ever been denied credit by credit grantor (i.e., car dealer, bank, mortgage company, landlord, charge card company or retailer)?
  - (a) If so, do you (or that person) know the reason why?
  - (b) If the reason was information contained in a credit report, do you know whether the information which resulted in the denial was inaccurate.

- (c) If the information was inaccurate, did you or that person determine why or how it appeared in your report?
  - (d) Did you or that person attempt to correct the inaccuracy? If so, did you or that person experience any difficulty or delay in obtaining the correction?
- 3. Have you ever borrowed money under an agreement to repay the money over time on a monthly or weekly basis?  
  
If so, did you perform your obligations on a timely basis?
- 4. Have you ever loaned money under an agreement that the money be repaid over time on a monthly or weekly basis?  
  
If so, did that person perform his or her obligations on a timely basis?
- 5. Have you ever leased a car or other property for a term of months or years?  
  
If so, did you perform your obligations on a timely basis?
- 6. Have you or a family member ever been the subject of a collection firm's collection efforts of a debt for a hospital or otherwise?
  - (a) If so, was the debt yours (or your family member's)?
  - (b) Did you (or your family member) owe the money which the collection firm was attempting to collect?
  - (c) Was the collection record (to your knowledge) ever reported to your (or your family member's) credit file?
  - (d) Was the collection record (to your knowledge) ever reported in connection with a credit application?

7. Have you or a family member ever filed for bankruptcy, have a judgment or tax lien against you (or them)?
- (a) If so, was that information ever reported in your (or your family member's) credit file?
- (b) Was that information accurately reported your (or your family member's) credit file?
- (c) Was the bankruptcy, judgment, or lien (to your knowledge) ever reported in connection with a credit application?

Respectfully Submitted,

SATZBERG, TRICHON,  
KOGAN & WERTHEIMER, P.C.

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MARK E. KOGAN	(10186)
BRUCE S. LUCKMAN	(38636)
TIMOTHY P. CREECH	(81728)

1818 Market St., 30<sup>th</sup> Floor  
Philadelphia, PA 19103  
(215) 575-7600; Fax: (215) 575-7688

*Counsel for Defendant,  
Trans Union LLC*

DATED: June 11, 2003